

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION**

-----	X	
JASON WILLIAMS,	:	
	:	
Plaintiff,	:	
	:	Case No.: 5:19-cv-00475-BO
vs.	:	
	:	
AT&T MOBILITY LLC,	:	
	:	
Defendant.	:	
-----	X	

**PLAINTIFF’S NOTICE OF MOTION  
TO COMPEL DEFENDANT AT&T MOBILITY LLC TO PRODUCE DOCUMENTS**

Plaintiff Jason Williams, by and through his undersigned counsel, respectfully moves this Court for an Order to compel Defendant AT&T Mobility LLC (“AT&T” or “Defendant”) to produce the documents listed in its February 15, 2022 Amended Privilege Log, pursuant to Federal Rules of Civil Procedure 26, 34 and 37 and the Local Rules of the Eastern District of North Carolina 7.1, 26.1 and 34.1.


In further support of this Motion, Plaintiff submits the accompanying memorandum of Law, the Declaration of Plaintiff Jason Williams, executed on April 28, 2022, the Declaration of Christopher N. LaVigne, executed on April 28, 2022, and the exhibits annexed thereto.

WHEREFORE, Plaintiff respectfully requests this Court to enter an order requiring Defendant AT&T Mobility LLC to produce the documents listed in its February 15, 2022 Amended Privilege Log.

Dated: April 28, 2022

Respectfully Submitted,

**WITHERS BERGMAN LLP**

By: 

\_\_\_\_\_  
Christopher N. LaVigne, Esq.  
Joseph Gallo, Esq.  
430 Park Avenue  
New York, New York 10022  
Telephone: (212) 848-9800  
Facsimile: (212) 848-9888  
[Christopher.LaVigne@withersworldwide.com](mailto:Christopher.LaVigne@withersworldwide.com)  
[Joseph.Gallo@withersworldwide.com](mailto:Joseph.Gallo@withersworldwide.com)

*Attorneys for Plaintiff Jason Williams*

Terence S. Reynolds  
**SHUMAKER LOOP & KENDRICK LLP**  
101 South Tyron Street, Suite 2200  
Charlotte, North Carolina 28280  
Telephone: (704) 375-0057  
Facsimile: (704) 332-1197  
[treynolds@shumaker.com](mailto:treynolds@shumaker.com)  
State Bar No. 49848

*Local Civil Rule 83.1(d) Counsel for  
Plaintiff Jason Williams*